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Attorneys for Defendant
APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ZEROCLICK, LLC, a Texas limited liability
company,

Plaintiff,

v.

APPLE INC., a California corporation,

Defendant.

Case No. 3:15-CV-04417-JST

**STIPULATION AND
~~PROPOSED~~ ORDER RE:
CLAIM CONSTRUCTION
BRIEFING**

Place: Courtroom 9, 19th Floor
Judge: Hon. Jon S. Tigar

Plaintiff Zeroclick, LLC (“Zeroclick” or “Plaintiff”) and Defendant Apple Inc. (“Apple” or “Defendant”) (collectively, the “Parties”) submit this Joint Stipulation to address the format of claim construction briefing for this action.

WHEREAS, the Parties previously submitted a Joint Claim Construction and Prehearing Statement relating to claim construction issues in this case;

WHEREAS, Apple has asserted invalidity of certain claims of the asserted patents based on indefiniteness and identified such issues for consideration in connection with claim construction; and

WHEREAS, the Parties have agreed to a briefing approach to address both terms for which the parties’ propose constructions and terms for which Apple asserts claims of indefiniteness;

NOW THEREFORE, THE PARTIES, by and through their respective counsel of record hereby stipulate as follows:

1. Zeroclick will file an opening brief of up to 15 pages regarding terms for which constructions are proposed, including the term “click event” (“Construction Terms”).
2. Apple will file an opening brief of up to 15 pages regarding terms that Apple contends render claims invalid for indefiniteness (“Indefiniteness Terms”).
3. Zeroclick will file a responsive brief of up to 15 pages regarding Indefiniteness Terms.
4. Apple will file a responsive brief of up to 15 pages regarding Construction Terms.
5. Zeroclick will file a reply brief of up to 10 pages regarding Construction Terms.
6. Apple will file a reply brief of up to 10 pages regarding Indefiniteness Terms.
7. All of these briefs will be filed pursuant to the previously-established schedule for the filing of opening, response and reply briefs.

1 SO STIPULATED

2 Dated: June 13, 2016

RUSS, AUGUST & KABAT

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4 /s/ Brian D. Ledahl

Brian D. Ledahl

5 *Attorneys for Plaintiff*
6 *Zeroclick, LLC*

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8 Dated: June 13, 2016

MORRISON & FOERSTER LLP

9 /s/ Barbara Barath

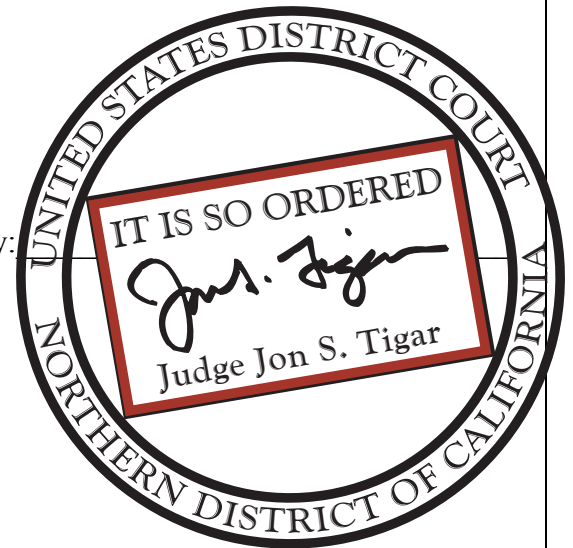
Barbara Barath

10 *Attorneys for Defendant*
11 *APPLE INC.*

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15 SO ORDERED.

16 DATED: June 13, 2016

17 By:



ATTESTATION TO SIGNATURE AUTHORIZATION

Pursuant to Local Rule 5-1(i)(3), I attest and confirm that all signatories of the above Joint Stipulation concur in the filing of this document.

Dated: June 13, 2016

By /s/ Brian D. Ledahl
Brian D. Ledahl